

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY  
POLICIES & PROCEDURES**

**Title:** Compliance Education and Training

**Number:** I.06.02

**Originated:** 02/09/10

**Approved By:** Executive Team

**Revised:** 02/14/12, 04/09/13, 08/12/14, 10/03/18, 02/13/25

**PURPOSE:** To articulate VBCMHA's commitment to comply with applicable legislative and regulatory standards as relevant to the accomplishment of its mission.

**POLICY:**

Proper and ongoing training and education of employees at all levels is a significant element of an effective compliance program. Therefore, VBCMHA will establish an initial compliance training program for new employees and periodic retraining of existing employees and, as applicable, independent contractors, on the Compliance Plan, compliance with rules and regulations and the provisions of the Compliance Code of Conduct, as well as the processes for obtaining advice and reporting misconduct.

Board members and employees will receive VBCMHA's Compliance Program training on the Compliance Plan and Code of Conduct at orientation and annually thereafter. The Compliance Officer will arrange tailored trainings for employees involved in specific areas of risk and will supplement with newsletters, emails and/or in-services, as needed. Records will be maintained for all formal trainings. The training program will include training on the provisions of the Code of Conduct, Medicare and Medicaid fraud and abuse laws including the Federal False Claims Act and Michigan False Claims Act, as well as the processes for how to report misconduct. Training is considered a condition of employment and failure to comply will result in appropriate disciplinary action.

Training and educational opportunities related to Compliance may be made available to contract providers, as well as customers and others, as appropriate.

**PROCEDURES:**

Open lines of communication between the Corporate Compliance Officer (CCO) and employees of VBCMHA and contracted providers, as applicable, are essential to staff's knowledge and awareness of compliance issues, to the successful implementation of the Compliance Plan, and to minimize noncompliance.

- Information will be communicated to employees through a variety of methods, such as formal training, impromptu information calls, emails, newsletters, intranet resource pages, or other methods that facilitate access to compliance related information, as a preventative means to reduce the potential for fraud, waste and abuse.

An effective training and education program within VBCMHA will consist of the following:

- Initial Education: Mandatory new employee Compliance Orientation will provide an overview of fraud, waste and abuse laws, a summary of the standards of conduct, an explanation of the elements of the Compliance Program, including the complaint or reporting process, HIPAA, and highlights of VBCMHA's commitment to integrity in its business operations and compliance with applicable laws and regulations.
- Periodic Training: Employees will be retrained in
  - (i) the VBCMHA Compliance Program annually;
  - (ii) the fraud, waste and abuse laws as they relate to claims development and submission process and VBCMHA's business relationships;
  - (iii) relevant Medicaid, Medicare, third party payor and other federal and state requirements; and
  - (iv) the consequences to both VBCMHA and individuals of failing to comply with applicable laws and regulations.Such trainings must emphasize the importance of the Compliance Program and VBCMHA's commitment to honesty and integrity in its business dealings.
- Tailored Training: Employees will be trained in specific federal health care program rules (e.g. Medicaid, Medicare) that relate to their particular job function, as needed.

Training and education may occur in in-service meetings, as part of special or regular program meetings, or in some other effective manner. Training may consist of live or electronic presentations, videos, question and answer sessions, and written materials, and may occur inhouse or through attendance at external workshops and seminars. All trainings will be documented, including the date and a brief description of the subject matter.

Not all employees of VBCMHA need/have the identical amount of training and education nor will the focus of training and educational efforts be the same for all employees. Training will be provided based on necessity, analysis of risk areas, and/or areas of concern as they arise. Failure to comply with training requirements may result in corrective or disciplinary action.

There will be periodic evaluations of training and education programs to determine, and, if necessary, improve, the value, effectiveness, and appropriateness of any such program.